

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

NEODRON LTD.,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Civil Action No. 1:19-cv-00819-ADA

**DEFENDANT DELL TECHNOLOGIES, INC.’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S AMDENDED COMPLAINT**

Defendant Dell Technologies, Inc. (“Dell”) files this unopposed motion for extension of time to answer or otherwise respond to Plaintiff Neodron Ltd.’s (“Plaintiff”) Amended Complaint (ECF No. 27).

Plaintiff filed its Amended Complaint on August 29, 2019 (ECF No. 27). Dell’s deadline to respond is thus September 12, 2019. The undersigned counsel for Dell conferred with Plaintiff’s counsel on September 11, 2019 to request a 30-day courtesy extension of Dell’s time to answer or otherwise respond to Plaintiff’s Complaint, and Plaintiff’s counsel confirmed that they do not oppose the requested extension.

Dell therefore respectfully requests an extension of time up to and including October 12, 2019, to answer or otherwise respond to the Amended Complaint. No prior extension of time has been requested.

Accordingly, Dell respectfully requests that the Court issue the attached proposed order extending Dell’s time to answer or otherwise respond to Plaintiff’s complaint to October 12, 2019.

Dated: September 11, 2019

Respectfully submitted,

By: /s/ Michael J. Newton

Michael John Newton (TX Bar No. 24003844)

Brady Cox (TX Bar No. 24074084)

**ALSTON & BIRD LLP**

2200 Ross Avenue, Suite 2300

Dallas, Texas 75201

Phone: (214) 922-3400

Fax: (214) 922-3899

mike.newton@alston.com

brady.cox@alston.com

Charles A. Naggar (admitted *pro hac vice*)

NY Bar No. 5356449

**ALSTON & BIRD LLP**

90 Park Avenue, 15th Floor

New York, NY 11230

Phone: (212) 210-9400

Fax: (212) 210-9444

charles.naggar@alston.com

*Attorneys for Defendant Dell Technologies Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on September 11, 2019.

*/s/ Michael J. Newton*  
\_\_\_\_\_  
Michael J. Newton